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**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

In re:

Adalberto Fuentes,

DEBTOR.

Chapter 13

Case No. 17-35139

Hon. Vincent F. Papalia

Oral Argument Not Requested

**NOTICE OF MOTION FOR AN ORDER AUTHORIZING THE DEBTOR
TO ENTER INTO A LOAN MODIFICATION AGREEMENT**

PLEASE TAKE NOTICE that the Debtor, Adalberto Fuentes (the “Debtor”) will move before the Honorable Vincent F. Papalia at the United States Bankruptcy Court, 50 Walnut Street, Newark, NJ 07102, on August 16, 2018 at 11:00 a.m., for an Order authorizing the Debtor to enter into a loan modification agreement concerning the mortgage loan encumbering his property located at 136 67th Street, West New York, NJ 07093 and for such other and further relief as this Court deems just and appropriate.

PLEASE TAKE FURTHER NOTICE that any answering papers or objections to the Debtor’s Motion must be filed and served at least seven (7) days before the return date of this motion. If you wish to object to this motion, you must file responding papers stating with particularity the basis of your objection to the motion. All such responsive papers must be filed

with the Clerk of the Bankruptcy Court for the District of New Jersey, located at 50 Walnut Street, Newark, New Jersey, and served simultaneously upon, David L. Stevens, as counsel for the Movant, at 1599 Hamburg Turnpike, Wayne, New Jersey 07470; and

PLEASE TAKE FURTHER NOTICE that oral argument is only requested if the motion is contested or so directed by the Court; and

PLEASE TAKE FURTHER NOTICE that this matter does not involve complicated issues of law or fact and therefore no brief is necessary.

Respectfully submitted,

**SCURA, WIGFIELD, HEYER,
STEVENS & CAMMAROTA, LLP**
Attorneys for Debtors

Dated: July 20, 2018

By: /s/ David L. Stevens
David L. Stevens, Esq.